

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**JOSEPH P. HADEED,**

**Plaintiff,**

**v.**

**EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC. and TRANS UNION  
LLC,**

**Civil Action No. \_\_\_\_\_**

**Defendants.**

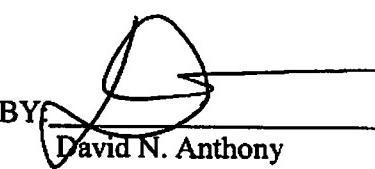
**JOINDER AND CONSENT TO REMOVAL FOR DEFENDANT EXPERIAN**

Without waiving any other defenses, Experian Information Solutions, Inc. hereby joins in and consents to the removal of this action from the Circuit Court for the City of Alexandria, Virginia.

Experian Information Solutions, Inc. first received a copy of the Complaint, the initial pleading setting forth the claim for relief upon which this action is based, on August 14, 2012.

**EXPERIAN INFORMATION SOLUTIONS,  
INC.**

BY

  
David N. Anthony

Virginia State Bar No. 31696

*Counsel for Experian Information Solutions, Inc.*

TROUTMAN SANDERS LLP

1001 Haxall Point

Richmond, VA 23219

Telephone: 804-697-5410

Facsimile: 804-698-5118

Email: [david.anthony@troutmansanders.com](mailto:david.anthony@troutmansanders.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**JOSEPH P. HADEED,**

**CASE NO.**

**Plaintiff,**

**vs.**

**EQUIFAX INFORMATION SERVICES LLC,  
EXPERIAN INFORMATION SOLUTIONS, INC.  
TRANS UNION LLC,**

**Defendants.**

**EQUIFAX INFORMATION SERVICES LLC'S CONSENT TO REMOVAL**

Pursuant to Sections 1441 and 1446 of Title 28 of the United States Code, Defendant Equifax Information Services LLC acknowledges its consent to the removal of this action from the Circuit Court for the City of Alexandria, Virginia, to the United States District Court for the Eastern District of Virginia without waiving its rights to assert any personal jurisdictional claims or other motions, including Rule 12 motions and/or any other motions under the Federal Rules of Civil Procedure.

Equifax was served with the Complaint on August 14, 2012.

Dated: August 28, 2012.

Respectfully submitted,



John W. Montgomery, Jr.  
Virginia State Bar No. 37149  
Counsel for Equifax Information Services, LLC  
Montgomery & Simpson, LLLP  
2116 Dabney Road, Suite A-1  
Richmond, VA 23230  
Telephone (804) 355-8744  
Facsimile (804) 355-8748  
Email: [jmontgomery@jwm-law.com](mailto:jmontgomery@jwm-law.com)